

THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

ROBERT EDWIN JACOBSEN
XXX-XX-2723
101 CN FREENVILLE ROAD
NO. 259
ALLEN, TX 75002

CASE NO. 07-41092-R

CHAPTER 13

DEBTOR(S)

CHAPTER 13 TRUSTEE'S OBJECTION TO MOTION TO DISMISS

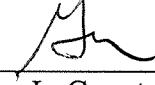
TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW JANNA COUNTRYMAN, Trustee herein, and files this, her Objection to Motion to Dismiss in the above numbered and styled proceeding, and for cause would show the following:

1. The Debtor filed for voluntary relief under Chapter 13 of the Bankruptcy Code on May 25, 2007.
 2. The Trustee moved to convert this case to Chapter 7 for cause, including lack of disclosure.
 3. The Debtor thereafter requested dismissal of the case.
 4. There appear to be substantial undisclosed non-exempt assets.
 5. The Trustee requests that the Court deny the motion to dismiss and convert the case to Chapter 7.

WHEREFORE PREMISES CONSIDERED, the Trustee requests the Court deny the Motion to Dismiss as stated above, and for other relief that may be just.

Respectfully submitted,


Janna L. Countryman, TBN 04888050
Greg R. Arnove, TBN 00783562
Office of the Standing Chapter 13 Trustee
500 North Central Expressway, Suite 350
Plano, Texas 75074
(972) 943-2580 / Fax (972) 943-8050

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Chapter 13 Trustee's Objection to Motion to Dismiss has been served upon the following parties in interest on or before the date set forth below by electronic mail and/or by mailing a copy of same to them via first class mail. If no address is listed, no notice was sent to that party.

ROSSINI & WAGNER PC
1201 MAIN STREET, SUITE 2470
DALLAS, TX 75202

ROBERT EDWIN JACOBSEN
101 CN FREENVILLE ROAD
NO. 259
ALLEN, TX 75002

SAXON MORTGAGE
1270 NORTHLAND DRIVE, SUITE 200
MENDOTA HEIGHTS, MN 55120

HAROLD M. JAFFE, ESQ.
3521 GRAND AVENUE
OAKLAND, CA 94610

JOE LOZANO, JR.
BRICE, VANDERLINDEN & WERNICK, P.C.
P.O. BOX 829009
DALLAS, TX 75382-9009

Dated 8-3-07


Office of the Standing Chapter 13 Trustee